

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE:

W.R. GRACE & CO., *et al.*

Debtors

Chapter 11

Case No. 01—01139 (JFK)

Jointly Administered

Objection Deadline: Aug. 4, 2006

Hearing Date: Sept. 11, 2006

General and Specific Objections to Discovery Questionnaire and Response to Debtors' Motion to Compel Submitted on Behalf of the Personal Injury Claimants of Early, Ludwick, Sweeney & Strauss

Early, Ludwick & Sweeney, LLC and Early & Strauss, LLC (collectively "Early, Ludwick, Sweeney & Strauss" or "ELSS") are counsel for asbestos personal injury claimants ("claimants") upon whom the Debtors served, or attempted or may have intended to serve, a copy of the W.R. Grace Asbestos Personal Injury Questionnaire.

To the extent that objections by claimants represented by ELSS have not been made by other counsel on its behalf, ELSS opposes the Debtors' Motion to compel. As a matter of efficiency, desiring not to be repetitive and respecting this Court's time, ELSS simply joins and reiterates the general and specific objections when appropriate made by all other counsel representing similarly situated claimants in this matter.

Respectfully submitted,

/s/ Ethan Early

Ethan Early

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Dated: August 11, 2006

CERTIFICATE OF SERVICE

I, Ethan Early, certify that I am not less than 18 years of age, and that service of this opposition to Debtors' motion was made on August 11, 2006, to the below parties by U.S. First Class Mail:

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Under penalty of perjury, I declare that the foregoing is true and correct.

August 11, 2006

/s/ Ethan Early

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